

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS
WESTERN MASSACHUSETTS ELECTRIC COMPANY
D.T.E. 04-40/04-109/05-10**

Pursuant to G.L. c. 164, § 1A(a), 220 C.M.R. § 11.03(4) and the Restructuring Settlement Agreement approved by the Department of Telecommunications and Energy ("Department") in Western Massachusetts Electric Company, D.T.E. 97-120-E (2000), the Department of Telecommunications and Energy ("Department") submits to Western Massachusetts Electric Company ("WMECo" or "Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the responses to Sandy Callahan, Hearing Officer, and four (4) copies to Sean Hanley, Assistant Director of the Rates and Revenue Requirements Division.

INFORMATION REQUESTS

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| DTE 1-1 | Refer to Exhibit MJM-3, at 6. Please explain the line item “Unrecovered Prior Spent Nuclear Fuel.” |
| DTE 1-2 | Refer to Exhibit MJM-3, at 13. Please provide the derivation of the \$667,000 ratepayer credit resulting from the Department’s decision in D.T.E. 03-82. |
| DTE 1-3 | Refer to Exhibit MJM-3, at 7, column G. Please provide an explanation of the \$397,000 interest on spent nuclear fuel amount. |
| DTE 1-4 | Refer to page 7 of the pre-filed testimony of Michael J. Mahoney. Please provide the rate of interest (i.e., Treasury interest rates, customer deposits rates, etc.) used to calculate carrying charges on under/over recoveries of Standard Offer Service for years before 2003. |
| DTE 1-5 | Refer to Exhibit MJM-3, at 1. Please provide the rate of interest used to calculate carrying charges for those years in which there was a transition cost under-recovery. |
| DTE 1-6 | Refer to page 8 of the pre-filed testimony of Michael J. Mahoney. Please provide a narrative describing how the funds provided by the \$50,388,000 over-recovery of transition charges have been utilized by the Company. |
| DTE 1-7 | Refer to page 10 of the pre-filed testimony of Michael J. Mahoney and Exhibit MJM-3, at 1. Please provide work papers which support the derivation of the carrying charges of \$3,509,000 and \$3,742,000 appearing on Exhibit MJM-3, at 1. |

- DTE 1-8 Refer to Exhibit MJM-3, at 1. Please provide a copy of the settlement agreement which permits the Company to adjust transition costs by an annual inflation adjustment.
- DTE-1-9 Refer to Exhibit MJM-3, at 1. Please provide a copy of the settlement agreement that permits the Company to collect the deferred fuel adjustment of \$4,173,000 through the transition charge.
- DTE 1-10 Refer to Exhibit MJM-3, at 1. Please describe the \$7,400,000 adjustment to the over-recovery of transition costs, include the components of this adjustment and the specific authority that WMECo received for this adjustment through DTE 02-20 or the Settlement Agreement between the Company and the Attorney General to address the transition costs and revenues for the time period between 1998 and 2001.
- DTE 1-11 Refer to Exhibit MJM-3, at 1. Please explain the December 31,2002 \$7,090,000 adjustment to the cumulative over-recovery of transition costs.
- DTE 1-12 Refer to Exhibit MJM-3, at 12. Please provide the derivation of the \$9,175,000 return on unamortized balance for the year 2004.